

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Dante Brown,)	
)	Case No. 18-cv-05955
Plaintiff,)	
)	
v.)	Honorable Sharon Johnson Coleman
)	
Wexford Health Sources, Inc. et al.,)	Magistrate Judge Sheila M. Finnegan
)	
Defendants.)	

JOINT STATUS REPORT

Status of Fact Discovery

For all intents and purposes, fact discovery is postured to be closed. With the retirement of Abraham Brustein and the subsequent appointment of Mark J. Silberman, Plaintiff's counsel is in the process of reviewing the available documentation with the purpose of verifying that there is no further discovery needing to be required. Counsel previously represented to the Court, and represents herein, that any request to extend discovery will be initially raised with counsel for Defendants to see if agreement can be reached and will be limited to that which is necessary to fulfill counsel's legal obligations to Mr. Brown. That said, all scheduled depositions have been completed.

Status of Transition of Counsel

Mr. Silberman has had the ability to have an initial call with Mr. Brustein who, despite his retirement, has continued to make himself available as a resource to facilitate the transition and ensure the protection of Mr. Brown's interests. Mr. Silberman has identified a team of attorneys at Benesch who will assist with representing Mr. Brown and have begun to review the available discovery. Plaintiff's counsel has secured the first available date and time to speak with Mr. Brown

on November 12, 2021 to ensure appropriate communication between counsel and client and agree upon the strategic advancement of this matter. It is our expectation that we should be able to have reviewed discovery by that point and then be able to clarify whether we need to proceed with expert discovery or whether the parties can move forward with dispositive motions.

Dispositive Motions

Defendants are ready to proceed with dispositive motions. Rather than unnecessarily extend the briefing schedule, Plaintiff's counsel wants to get up to speed and coordinate with his client prior to the establishment of the briefing schedule and will abide by whatever scheduling this Court deems appropriate.

Status of Settlement

The parties at this point are not inclined to pursue a settlement conference but will keep the court advised as to any changes in that regard.

Respectfully Submitted,

Dante Brown

By: /s/ Mark J. Silberman
One of his attorneys

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